

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

**GENOVA BURNS LLC**

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In Re:

SBB Shipping USA, Inc.,

Debtor-in-Possession.

Case No.: 24-22278

Judge: Vincent F. Papalia

Chapter: 11

Hearing Date: April 29, 2025 at 10 am ET

**NOTICE OF MOTION BY THIRD PARAMUS ASSOCIATES, LLC FOR  
ENTRY OF AN ORDER DIRECTING THE APPOINTMENT OF AN EXAMINER**

**PLEASE TAKE NOTICE**, that on **April 29, 2025 at 10:00 am ET**, or as soon thereafter as counsel may be heard, the undersigned, as counsel for Third Paramus Associates, LLC, shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102, for entry of the within Proposed Order.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion herewith in support of the relief requested.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is waived unless opposition papers are filed.

**PLEASE TAKE FURTHER NOTICE**, that responsive pleadings, if any, must be filed with the Clerk of the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street Newark, NJ 07102 and served upon Genova Burns, LLC, 494 Broad Street, 6<sup>th</sup> Floor, Newark, NJ 07102 so that such objections are received by **April 22, 2025**.

**PLEASE TAKE FURTHER NOTICE**, that in the absence of any objections, the relief requested may be granted without further notice.

Respectfully submitted,

**GENOVA BURNS, LLC**

*Attorneys for Third Paramus Associates, LLC,*

Date: April 3, 2025

/s/ Donald W. Clarke

Donald W. Clarke, Esq.